

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
NICOLE E. JANOUSEK	:	
Debtor,	:	
	:	Bankruptcy No. 1:17-bk-02516-HWV
TOYOTA MOTOR CREDIT	:	
CORPORATION	:	
Movant,	:	
	:	
vs.	:	
	:	
NICOLE E. JANOUSEK	:	
CHARLES J. DEHART, III	:	
Respondents.	:	

**DEBTOR'S ANSWER TO TOYOTA MOTOR CREDIT CORPORATION'S MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. SECTION**

**362**

AND NOW COMES, NICOLE E. JANOUSEK, Debtor, who, by and through her attorneys, Jacobson & Julius, files her Answer to Toyota Motor Credit Corporation's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. It is admitted that Debtor is behind in post-petition payments to Movant. It is denied that the amount of the arrearage is as set forth in Movant's Motion. Regardless, Debtor is hopeful that Movant will allow the Debtor to execute a Stipulation not to exceed six months.

7. Admitted in part and denied in part. It is admitted that Debtor is behind in post-petition payments to Movant. It is denied that the amount of the arrearage is as set forth in Movant's Motion. Regardless, Debtor is hopeful that Movant will allow the Debtor to execute a Stipulation not to exceed six months.

8a-c. Paragraph 8 of Movant's Motion is a conclusion of law which no response is required.

9. Paragraph 9 of Movant's Motion is a conclusion of law which no response is required.

WHEREFORE, Debtor, through counsel, respectfully requests this honorable court deny Movant's Motion and grant any other relief deemed just and appropriate.

Respectfully Submitted,

JACOBSON & JULIUS

s/ Chad J. Julius

Chad J. Julius

ID # 209496

8150 Derry Street, Ste. A

Harrisburg, PA 17111

717.909.5858

717.909.7788 [fax]

Date: January 5, 2017

CERTIFICATE OF SERVICE

I, Tiffany Ramsey, paralegal with Jacobson & Julius, hereby certify that I have served a copy of the foregoing Answer on the following person(s) by E-Service, addressed to:

JAMES C. WARMBRODT, ESQUIRE  
KML LAW GROUP, P.C.  
SUITE 500- BNY INDEPENDENCE CENTER  
701 MARKET STREET  
PHILADELPHIA, PA 19106-1532

CHARLES J. DEHART III, ESQUIRE  
CHAPTER 13 TRUSTEE  
8125 ADAMS DRIVE, SUITE A  
HUMMELSTOWN, PA 17036  
dehartstaff@pamd13trustee.com; [harrisburgect@ramapo.com](mailto:harrisburgect@ramapo.com)

U.S. TRUSTEE  
228 WALNUT STREET, SUITE 1190  
HARRISBURG, PA 17101

Dated: January 5, 2017

s/Tiffany Ramsey  
Jacobson & Julius  
8150 Derry Street  
Harrisburg, PA 17111  
717.909.5858  
FAX: 717.909.7788